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November 12, 2021

VIA ECF

Hon. Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Starrett City Medical, P.C., et al.*
Civil Case No.: 1:21-cv-00059-NCG-RML
RR File No. 5100-3155

Dear Magistrate Judge Levy:

We are counsel to Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively “Plaintiffs”) in the above-referenced matter. We submit this joint status report, with the consent of counsel for Defendants, pursuant to your Order dated October 12, 2021.

As previously reported, Plaintiffs and the following Defendants have reached a settlement in principle: Physical Therapy of New York, P.C., Handy Physical Therapy, P.C., LK Acupuncturist, P.C., SJM Acupuncture, P.C., Jeff Harmonize Acupuncture, P.C., Starrett City Medical, P.C., Hillcrest Medical Care, P.C., Choi Acupuncture, P.C., Choice Acupuncture, P.L.L.C., Choi-Go Acupuncture, P.L.L.C., Flatlands Chiropractic Wellness, P.C., Kings Chiropractic Wellness, P.C., Your Choice Chiropractic, P.C., All About Chiropractic, P.C., J Park Chiropractic, P.C., Mahmoud Shalaby, Mohamed Elsayed Khallaf, Lyudmila Krupnova, L.Ac., Stacy Juyoung Moon, L.Ac., Guo Chu Wu, L.Ac., Hyeongsook Choi, L.Ac., Leonard Luna, D.C., Azu Ajudua, M.D., Jongdug Park, D.C., Alexander Gulkarov, LL Consulting Group, Inc. d/b/a Billing 4 You, L.L.C., Roman Israilov, and All Network Marketing Corp. (“Initial Settling Defendants”).

In addition, GEICO has also now reached settlements in principle with Defendants PL Acupuncture, P.C., Pascale Lawson, L.Ac., Peter Khaim a/k/a Peter Khaimov, and A&P Holding Group Corp. (together with the Initial Settling Defendants, “Settling Defendants”). Plaintiffs and the Settling Defendants are in the process of drafting and executing the settlement agreements.

As for the remaining Defendants, Irina Kataeva, L.Ac. and Cityworks Physical Therapy, P.C., the parties are presently engaged in settlement discussions, and are hopeful an agreement will soon be reached.

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However, as the parties have yet to reach an agreement, pursuant to your Order dated October 12, 2021, the parties propose the following schedule for the completion of discovery:

- Completion of fact discovery: December 15, 2021;
- Completion of expert discovery: March 15, 2022;
- Deadline to file dispositive motions: April 15, 2022.

We appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP
/s/ Frank P. Tiscione
Frank P. Tiscione

cc: All counsel via ECF